

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

FRANK STAPLES, ET AL.

Plaintiffs

v.

GOVERNOR CHRISTOPHER SUNUNU,
ET AL.

Defendants

Civil No. 1:24-cv-00331-LM-TSM

**DEFENDANT O’LEARY’S MOTION TO EXTEND RESPONSE DEADLINE
TO PLAINTIFFS’ AMENDED COMPLAINT**

NOW COMES Charles O’Leary, in his individual capacity (“Defendant”), by and through counsel, the Office of the Attorney General, and respectfully requests that the Court extend the deadline for the Defendant to file a response to Plaintiffs’ Amended Complaint until June 16, 2025. In support of this request, the Defendant states as follows:

1. On or around April 17, 2025, the Plaintiffs filed an Amended Complaint with Jury Demand (ECF Doc. No. 48).
2. Plaintiffs’ Amended Complaint is approximately fifty (50) pages long, consisting of over One Hundred Forty-Nine (149) paragraphs of factual allegations, legal arguments, and claims, many of which were not noticed in the initial Complaint. For reference, Plaintiffs’ initial complaint was approximately ten (10) pages in length.
3. The Defendant’s response to the Plaintiffs Amended Complaint is presently due May 1, 2025.
4. Due to the number of additional pages and paragraphs of factual allegations, legal arguments, and claims, along with undersigned counsel’s workload and preparing for a June

2025 Jury Trial in another matter, the Defendant requires additional time to review the Amended Complaint and prepare a response.

5. Accordingly, the Defendant respectfully requests that his response deadline be extended until June 16, 2025, to align with the response deadline of the other Defendants.

6. The Plaintiffs do not assent to the relief requested herein.

WHEREFORE, the Defendant respectfully requests this Honorable Court:

A. Grant this Motion to Extend;

B. Extend the Defendant's deadline to file a responsive pleading until June 16, 2025; and

C. Grant such further relief as justice may require.

Respectfully Submitted,

CHARLES O'LEARY,
in his individual capacity

By his attorneys,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: May 1, 2025

/s/ Christina M. Wilson
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Extend was served this 1st day of May 2025 through the Court's ECF system.

/s/ Christina M. Wilson
Christina M. Wilson